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10 UNITED STATES DISTRICT COURT  
11 WESTERN DISTRICT OF WASHINGTON AT SEATTLE  
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14 NATIONAL FROZEN FOODS  
15 CORPORATION, a Washington corporation,  
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17 Plaintiff,  
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19 v.  
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21 BERKLEY ASSURANCE COMPANY, an  
22 Iowa corporation; AMWINS BROKERAGE  
23 OF ILLINOIS, a North Carolina Limited  
24 Liability Company; AMWINS BROKERAGE  
25 OF ARIZONA, a Delaware Limited Liability  
26 Company; and AMWINS GROUP LLC, a  
27 Delaware Limited Liability Company,  
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29 Defendants.  
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NO. 2:17-cv-00339 RSM

STIPULATED MOTION AND ORDER  
AMENDING DISCOVERY DEADLINES

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33 **STIPULATION**  
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35 The parties, by and through their counsel of record, hereby stipulate and agree to this  
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37 joint request to the Court to amend certain discovery deadlines contained in the Order Amending  
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39 Order Setting Trial Date and Related Dates (Dkt. 53). The reasons justifying the proposed  
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41 amendment are as follows:  
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- 43 • Severe weather on the East Coast forced the cancellation of the 30(b)(6) and  
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45 individual depositions of Berkley Assurance Corporation that were scheduled to take

place in New York the week of July 16. The earliest dates that these depositions can be rescheduled is for the week of September 3, which is after the current expert disclosure / report deadline; and

- Scheduling issues have arisen with several other fact witness depositions that necessitate an amendment to the current case schedule in order to allow sufficient time to complete expert discovery.

The parties therefore stipulate and agree that the case schedule deadlines should be amended as follows:

Event	Current Deadline	New Deadline
Expert Witness Disclosure/Reports under FRCP 26(a)(2)	August 8, 2018 [Moved to August 22, 2018 pursuant to prior stipulation]	September 19, 2018
Discovery Motions	September 10, 2018	October 3, 2018
Expert Rebuttal Reports	September 21, 2018 <sup>1</sup>	October 10, 2018
Discovery Completed By	October 8, 2018	October 29, 2018

All other case schedule deadlines will remain the same.

<sup>1</sup> The prior case schedule did not have a rebuttal report deadline. The Federal Rules provide 30 days to disclose rebuttal reports. The parties have stipulated to a shorter deadline for rebuttal reports than what is provided under the Federal Rules, and therefore ask that this is reflected in the amended case schedule.

1 DATED this 20th day of July, 2018.

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**ORDER**

The Court has considered the foregoing stipulation of the parties. It is ORDERED that the case schedule deadlines be amended as follows:

Event	Current Deadline	New Deadline
Expert Witness Disclosure/Reports under FRCP 26(a)(2)	August 8, 2018 [Moved to August 22, 2018 pursuant to prior stipulation]	September 19, 2018
Discovery Motions	September 10, 2018	October 3, 2018
Expert Rebuttal Reports	September 21, 2018	October 10, 2018
Discovery Completed By	October 8, 2018	October 29, 2018

All other case schedule deadlines will remain the same.

IT IS SO ORDERED.

DATED: July 23, 2018



**RICARDO S. MARTINEZ**  
CHIEF UNITED STATES DISTRICT JUDGE